

NATHAN L. JACKSON, Individually § and on behalf of a putative § class of similarly situated § individuals, §

Plaintiffs,

٧.

V.

EAST TEXAS MEDICAL CENTER, ATHENS, ET AL,

Defendants and Third-Party Plaintiffs,

AETNA HEALTH AND LIFE INSURANCE COMPANY, ET AL,

Third-Party Defendants.

CIVIL ACTION NO. 6:00-CV-442

## CONNECTICUT GENERAL'S ORIGINAL ANSWER

8 8 8

§

§

§

S

50 50 50

§

S

S

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Connecticut General Life Insurance Company [hereinafter "Connecticut General"], one of the Third-Party Defendants herein, and would respectfully show the Court the following in answer to Defendants' Original Third-Party Petition [hereinafter "Petition"]:

I.

In answer to section I of the Petition, Connecticut General admits that its registered agent, CT Corporation, may be served at 350 N. St. Paul Street, Dallas, Texas 75201, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in said section.



In answer to section II of the Petition, Connecticut General states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein.

III.

In answer to section III of the Petition, Connecticut General states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein.

IV.

In answer to section IV of the Petition, Connecticut General denies that Defendants/Third-Party Plaintiffs are entitled to contribution or indemnity from Connecticut General, and denies that Connecticut General is liable to Defendants/Third-Party Plaintiffs for any erroneously-refunded payments, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in said section.

v.

In answer to section V of the Petition, Connecticut General states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein.

VI.

In answer to section VI of the Petition, Connecticut General denies that Defendants/Third-Party Plaintiffs are entitled to any relief from Connecticut General, but states that it is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained therein.

To the extent not otherwise addressed above, Connecticut General denies each of the allegations contained in the Petition.

WHEREFORE, PREMISES CONSIDERED, Connecticut General prays that Defendants/Third-Party Plaintiffs take nothing by their suit against Connecticut General, and that Connecticut General recover its reasonable attorney's fees and costs from Defendants/Third-Party Plaintiffs, and for such other and further relief to which it may be justly entitled.

Respectfully submitted,

James L. Johnson Texas Bar No. 1074202

THE JOHNSON LAW FIRM 6500 Greenville Avenue Suite 345, LB 30 Dallas, Texas 75206

Telephone: 214/363-1629 Telecopier: 214/363-9173

ATTORNEY-IN-CHARGE FOR THIRD-PARTY DEFENDANT CONNECTICUT GENERAL LIFE INSURANCE COMPANY

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on Michael E. Jones, counsel for Defendants/Third-Party Plaintiffs, by certified mail, return receipt requested, and on David B. Lemon, counsel for Plaintiff, and Michael T. Crawford, counsel for Third-Party Defendant Combined Underwriters Life Insurance Company, by regular mail.

James L. Johnson